

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

6154 Mission Gorge Road
(Mail: Suite 205/Enter: Suite 106)
San Diego, California 92120-1939
Telephone: (619) 265-5114

Scott's desk**CERTIFIED MAIL - RETURN RECEIPT REQUESTED***CR*

September 10, 1985

Mr. Ralph Edwards, Region
Environmental Director
Mobil Oil Corporation
612 South Flower Street
Los Angeles, California 90017

Dear Mr. Edwards:

Enclosed is a copy of Cleanup and Abatement Order No. 85-77. This Cleanup and Abatement Order is being issued to Mobil Oil Corporation in response to the petroleum hydrocarbon leak in the underground tank system at Mobil Service Station No. 08-099 which was discovered in March 1984. As you know this leak in the underground tank system at Mobil Service Station No. 08-099 resulted in the release of 4700 gallons or so of gasoline. The leak resulted in the contamination of ground water and soil at the site. Basically, the Cleanup and Abatement Order directs Mobil Oil Corporation to develop alternatives to cleanup the petroleum hydrocarbon contamination resulting from the underground tank leak. The Cleanup and Abatement Order also directs Mobil Oil Corporation to implement the cleanup alternative selected by Regional Board staff after staff's review of the cleanup alternatives developed by Mobil Oil Corporation.

The issuance of this Cleanup and Abatement Order is not to be construed as a punitive measure. On the contrary, Regional Board staff is satisfied with and appreciative of the cooperation and ongoing good faith efforts being made by Mobil Oil Corporation to clean up the petroleum hydrocarbon contamination caused by the underground tank leak. Rather, the Cleanup and Abatement Order provides the Regional Board with the means to take rapid enforcement action should the cleanup program stall for whatever reason.

This Cleanup and Abatement Order is issued to Mobil Oil Corporation under the authority of California Water Code Section 13304. Section 13304 provides:

- (a) Any person who has discharged or discharges waste into the waters of this state in violation of any waste discharge requirement or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and shall upon order of the regional board clean up such waste or

abate the effects thereof or, in the case of threatened pollution or nuisance, take other necessary remedial action. Upon failure of any person to comply with such cleanup or abatement order, the Attorney General, at the request of the board, shall petition the superior court for that county for the issuance of an injunction requiring such person to comply therewith. In any such suit, the court shall have jurisdiction to grant a prohibitory or mandatory injunction, either preliminary or permanent, as the facts may warrant.

(b) The regional board may expend available moneys to perform any cleanup, abatement, or remedial work required under the circumstances set forth in subdivision (a) which in its judgment is required by the magnitude of endeavor or urgency of prompt action needed to prevent substantial pollution, nuisance, or injury to any waters of the state. Such action may be taken in default of, or in addition to, remedial work by the waste discharger or other persons, and regardless of whether injunctive relief is being sought. The regional board may perform the work itself, or by or in cooperation with an other governmental agency, and may use rented tools or equipment, either with operators furnished or unoperated. Notwithstanding any other provisions of law, the regional board may enter into oral contracts for such work, and the contracts, whether written or oral, may include provisions for equipment rental and in addition the furnishing of labor and materials necessary to accomplish the work. Such contracts shall be exempt from approval by the Department of General Services pursuant to the provisions of Section 14780 of the Government Code.

(c) If such waste is cleaned up, the effects thereof abated, or, in the case of threatened pollution or nuisance, other necessary remedial action is taken by any governmental agency, the person or persons who discharged the waste, discharges the waste, or threatened to cause or permit the discharge of the waste within the meaning of subdivision (a), shall be liable to that governmental agency to the extent of the reasonable costs actually incurred in cleaning up such waste, abating the effects thereof, or taking other remedial action. The amount of such costs shall be recoverable in a civil action by, and paid to, such governmental agency and the state board to the extent of the latter's contribution to the cleanup costs from the State Water Pollution Cleanup and Abatement Account or other available funds.

(d) If, despite reasonable effort by the regional board to identify the person responsible for the discharge of waste or the condition of pollution or nuisance, such person is not identified at the time cleanup, abatement or remedial work must be performed, the regional board shall not be required to issue an order under this section.

(e) "Threaten," for purposes of this section, means a condition creating a substantial probability of harm, when the probability and potential extent of harm make it reasonably necessary to take immediate action to prevent, reduce or mitigate damages to persons, property, or natural resources.

(f) This section does not impose any new liability for acts occurring before January 1, 1981, if the acts were not in violation of existing laws or regulations at the time they occurred.

(Amended by Stats. 1971, Ch. 1288; by Stats, 1980, Ch. 808.)


(Note the authority of regional boards in subsection (b) to expend available moneys to perform cleanup work when a cleanup order has been issued under subsection (a), and prompt action is needed to prevent substantial pollution or nuisance. Full authority to take all necessary action can be delegated to executive officer (Section 13223). "Available moneys" ordinarily refers to moneys in the State Water pollution and Abatement account (Section 13441). Funds made available from an outside source, such as the Federal Government, could also constitute "available moneys." Note that authority to expend moneys for cleanup requires an exercise of judgment be in writing. A letter to the state board should request needed funds and give the reasons in the context of the statute, such as the existence of an "urgency of prompt action is needed to prevent substantial pollution." A previous phone call could ascertain whether necessary funds are available.)

In order to avoid further enforcement action by the Regional Board, I strongly urge a prompt and complete response to each directive of Cleanup and Abatement Order No. 85-77. The issuance of this Cleanup and Abatement Order to Mobil Oil Corporation will be discussed at the September 16, 1985 Regional Board meeting. This meeting is open to public participation and you are welcome to attend. It is scheduled for 9:30 a.m. in room B109 of the State Office Building, 1350 Front Street, San Diego.

September 10, 1985

Both my staff and I will be happy to work with you toward achieving compliance with the Cleanup and Abatement Order. If you have any questions or would like to set up a meeting to discuss this matter further, please contact Mr. Scott Hugenberger at (619) 265-5114.

Very truly yours,



LADIN H. DELANEY
Executive Officer

SH:vn

Enclosures

cc: Ms. Vicki Gallagher
Hazardous Materials Management Unit
Department of Health Services
San Diego, CA 92101

Dr. Jeffrey W. Wiegand
J.T. Alton, Inc.
16510 Aston St.
Irvine, CA 92714

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

6154 Mission Gorge Road
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Telephone: (619) 265-5114



September 13, 1985

Mr. Ralph Edwards
Region Environmental Director
Mobil Oil Corporation
612 South Flower Street
Los Angeles, California 90017

Dear Mr. Edwards:

CORRECTION TO CLEANUP AND ABATEMENT ORDER NO. 85-77

Enclosed please find a revised copy of Cleanup and Abatement Order No. 85-77. Cleanup and Abatement Order No. 85-77 was issued to Mobil Oil Corporation on September 10, 1985. That Cleanup and Abatement Order contains a typographical error on page 3, item 13. The maximum allowable concentration for the constituent lead should be changed from 0.01 $\mu\text{g/l}$ to 10.0 $\mu\text{g/l}$. The rest of the Cleanup and Abatement Order remains the same.

If you have any questions, please call Mr. Scott Hugenberger at the above number.

Very truly yours,

DAVID T. BARKER
Senior Engineer

SH:vn

Enclosure

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

CLEANUP AND ABATEMENT ORDER NO. 85-77

**MOBIL OIL CORPORATION
SERVICE STATION NO. 08-099
POWAY
SAN DIEGO COUNTY**

1. Mobil Service Station No. 08-099 is located at 13556 Poway Road, at the corner of Poway Road and Midland in Poway. The site lies in the Poway Hydrographic Subunit of the Penasquitos Hydrographic Unit.
2. Regional Board staff received a report from Mobil Oil Corporation dated March 23, 1984 containing the following information. The service station operator discovered on March 5, 1984 that station product inventory records indicated a loss of petroleum hydrocarbon product possibly due to underground tank leakage. On March 6, 1984 a rupture in an underground product line was found and repaired. Mobil Oil Corporation hired a consultant to investigate and drill petroleum hydrocarbon product recovery wells. The ground water underlying the service station was tested and found to be contaminated as a result of the petroleum hydrocarbon leaks.
3. Mobil Oil Corporation representatives met with Regional Board staff on May 7, 1985 at the Regional Board office. Mobil Oil Corporation reported to Regional Board staff that 4700 gallons of petroleum hydrocarbon product was discharged to the ground water as a result of the leak and that ongoing cleanup efforts by Mobil Oil Corporation recovered 2400 gallons of the petroleum hydrocarbon product.
4. According to Mobil Oil Corporation, one ground water well exists on the opposite side of Poway Creek about 750 feet downgradient of the site which is used for domestic purposes.
5. Poway Creek is located about 500 feet south of the site. It appears that the ground water underlying the Mobil Service Station No. 08-099 is flowing in the direction of the creek and therefore threatens to cause a pollution in the creek.
6. The *Comprehensive Water Quality Control Plan Report, San Diego Basin (9)* (Basin Plan) was adopted by this Regional Board on March 17, 1975; approved by the State Water Resources Control Board on March 20, 1985; and updated by the Regional Board on February 26, 1978; March 23, 1981; January 24 and October 3, 1983; and August 27, 1984. The 1978, 1981, 1983 and 1984 updates were subsequently approved by the State Board.
7. The Basin Plan established the following beneficial uses for the ground waters in the Poway Hydrographic Subunit:
 - a) Municipal
 - b) Industrial Service Supply
 - c) Agricultural

8. The Basin Plan established the following beneficial uses for the surface waters in the Poway Hydrographic Subunit:

- a) Agricultural
- b) Industrial service supply
- c) Contact water recreation
- d) Non-contact water recreation
- e) Warm freshwater habitat
- f) Wildlife habitat

9. Section 13050(L) of the California Water Code defines "pollution" as follows:

"Pollution means an alteration of the quality of the waters of the State by waste to a degree which unreasonably affects (1) such waters for beneficial uses, or (2) facilities which serve such beneficial uses."

10. The plume of petroleum hydrocarbon contaminated ground water likely contains constituents in concentrations that exceed the water quality criteria listed in Finding 11 and could therefore impair the municipal beneficial use of the ground water in the Poway Hydrographic Subunit. The threatened impairment of the municipal beneficial use constitutes a pollution of state waters as defined in Finding 9. Water quality criteria listed in Finding 11 provide for the protection of human health from the potential toxic effects of these constituents through ingestion of contaminated water. The water quality criteria also provide for the prevention of undesirable petroleum hydrocarbon tastes and odors in the groundwater which would impair the municipal beneficial use.

11. To protect the beneficial uses listed in Finding 7 it is required that the ground water in the Poway Hydrographic Subunit not contain constituents exceeding the following applicable water quality criteria:

<u>Constituent</u>	<u>Maximum Allowable Concentration</u>
Total Petroleum Hydrocarbons	1.0 mg/l
Benzene	0.67 µg/l
Toluene	14.3 mg/l
Total Xylenes	12.0 mg/l
Ethyl Benzene	14.0 mg/l
Lead	50 µg/l

12. The plume of petroleum hydrocarbon contaminated ground water likely contains constituents in concentrations that exceed the water quality criteria listed in Finding 13. Since the contamination plume may migrate to Poway Creek as noted in Finding 5, the warm freshwater habitat beneficial use of the surface waters of the Poway Hydrographic Subunit could be impaired. The threatened impairment of the warm freshwater habitat beneficial use constitutes a pollution of state

waters as defined in Finding 9. The water quality criteria listed in Finding 13 provide protection of aquatic life from the potential toxic effects of these constituents.

13. To protect the beneficial uses listed in Finding 8 it is required that discharges to the surface waters in the Poway Hydrographic Subunit not contain constituents exceeding the following applicable water quality criteria:

Constituent	Maximum Allowable Concentration	
Total petroleum hydrocarbons	15	mg/l
Benzene	5.3	mg/l
Toluene	17.5	mg/l
Total Xylenes	14.5	mg/l
Ethyl Benzene	32	mg/l
Lead	10.0	µg/l

14. This enforcement action is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000 et seq.) in accordance with Section 15321, Chapter 3, Title 14, California Administrative Code.

IT IS HEREBY ORDERED, That pursuant to Section 13304 of the California Water Code:

1. Mobil Oil Corporation shall submit a report to this office no later than October 15, 1985 identifying and developing a range of remedial action alternatives to clean up the contamination resulting from the petroleum hydrocarbon discharge from Mobil Service Station No. 08-099. The report shall examine and determine the cost of each of the following cleanup strategies:
 - a) Treatment and/or removal of the contaminated ground water to attain the naturally occurring background concentrations for the following constituents in the underlying ground water aquifer:
 - (i) Benzene
 - (ii) Toluene
 - (iii) Ethyl Benzene
 - (iv) Total Xylenes
 - (v) Total petroleum hydrocarbons
 - (vi) Lead

This cleanup alternative represents basically complete cleanup of contamination resulting from the petroleum hydrocarbon discharge.

- b) Treatment and/or removal of the contaminated ground water to attain the following Environmental Protection Agency and Regional Board criteria in the underlying ground water aquifer:

<u>Constituent</u>	<u>Maximum Concentration</u>
Benzene	0.67 µg/l
Toluene	14.3 mg/l
Ethyl Benzene	1.4 mg/l
Total Xylenes	12.0 mg/l
Total Petroleum Hydrocarbons	1.0 mg/l
Lead	50 µg/l

- c) A remedial action alternative that concedes the contaminated ground water to a degraded status. Under this alternative it must be conclusively demonstrated that migration of petroleum hydrocarbon contaminated ground water to Poway Creek will not result in the discharge of contaminated ground water containing constituents in excess of the following limitations.

<u>Constituent</u>	<u>Maximum Concentration</u>
Total Petroleum Hydrocarbons	15.0 mg/l
Benzene	5.3 mg/l
Toluene	17.5 mg/l
Ethyl Benzene	32.0 mg/l
Total Xylenes	10.0 mg/l
Lead	10.0 µg/l

All variables associated with this alternative (e.g., ground water velocity field, dispersion coefficients, hydraulic conductivity, biodegradation rate constants, adsorption constants, porosity, etc.) must be fully identified and evaluated to a high level of confidence.

2. The cleanup alternatives required under Directive 1 of this Order will be evaluated in detail by Regional board staff. This evaluation will include the technical considerations, estimated costs and anticipated water quality impacts associated with each alternative. Based on this evaluation a specific cleanup alternative will be selected by Regional Board staff for implementation. Upon notification by the Executive Officer, Mobil Oil Corporation shall implement the Cleanup Alternative selected by Regional Board staff. If, however, Mobil Oil Corporation wishes to implement cleanup alternative 1a, then Mobil Oil Corporation may do so without having to develop cleanup strategies corresponding to cleanup alternatives 1b and 1c.
3. In the interim period until a final cleanup alternative is selected for implementation, Mobil Oil Corporation shall continue to take:
 - a) Effective remedial action to immobilize the plume of petroleum hydrocarbon contaminated ground water.

- b) Effective remedial action to remove all free petroleum hydrocarbon product from the affected ground water.
- 4. Mobil Oil Corporation shall dispose of petroleum hydrocarbon contaminated ground water and/or soil in accordance with all applicable state and federal regulations.
- 5. Mobil Oil Corporation shall, upon implementation of the selected cleanup alternative, submit quarterly reports discussing the cleanup program status and the progress made towards attaining the final selected cleanup criteria. Specific information to be included in the quarterly progress reports will be determined by Regional Board staff upon selection of the final cleanup alternative.

Ladin H. Delaney

LADIN H. DELANEY
Executive Officer

SH:vn

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

6154 Mission Gorge Road
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Telephone: (619) 265-5114

June 9, 1986

File: Mobil Pow



Mr. Ralph Edwards
Region Environmental Director
Mobil Oil Corporation
612 South Flower Street
Los Angeles, California 90017

Dear Mr. Edwards:

MOBIL OIL CORPORATION RESPONSE TO CLEANUP AND ABATEMENT ORDER NO. 85-77

On September 10, 1985 the Executive Officer of this Regional Board issued Cleanup and Abatement Order No. 85-77 to Mobil Oil Corporation in response to the underground petroleum hydrocarbon leak at Mobil Service Station No. 08-099 in Poway. The Cleanup and Abatement Order directed Mobil Oil Corporation to examine, develop, and cost a range of remedial strategies corresponding to the three sets of final cleanup levels listed in Directive 1 of the Cleanup and Abatement Order, and to submit this report to the office for review. After review Regional Board staff would select one of the remedial action strategies to be implemented by Mobil Oil Corporation.

Mobil Oil Corporation submitted a report dated September 26, 1985 in response to Directive 1 of the Cleanup and Abatement Order. After reviewing this report, Regional Board staff have determined that the report does not adequately respond to the aforementioned Directive 1. The report did not examine and cost remedial action alternatives, corresponding to the three final cleanup levels, in sufficient detail. In addition, the report did not present sufficient evidence to justify cleanup levels that concede the ground water to a degraded status. Regional Board staff comments on the report are listed below:

Page 08-099(3), Paragraph 3:

Even though the ground water may not currently meet drinking water standards, it is the responsibility of the Regional Board to protect the beneficial uses as established in the Comprehensive Water Quality Control Plan Report, San Diego Basin. You may petition the Regional Board for a change in the Basin Plan, if you wish.

Page 08-099(3), Paragraph 4:

No substantiation has been provided for the statement that "the likelihood of significant pollution of Poway Creek from this incident is low."

Page 08-099(5), Paragraph(a):

- a) Why is it "unrealistic and premature" to design and cost a system to clean the dissolved product plume?
- b) You need to explain the process of "bio-stimulation" in much greater depth.
- c) The report states that "residual petroleum hydrocarbon in the ...soils... could contribute to ground water contamination for an extended period of time." This statement begs the question - should the soil be removed? What is the estimated quantity of contaminated soil?

Page 08-099(5), Paragraph (b):

- a) The point of the report required under Directive 1 was for you to provide the Regional Board with design and cost data for a range of remedial action alternatives. This would allow the Regional Board to make a judgement if the projected cost of cleaning up the contaminated ground water to a particular level outweighs the broader public interest of restoring the ground water quality. No data have been provided to support your statement that the "cost of cleaning up the contaminated ground water ... by means of carbon absorption and/or airstripping or biostimulation processes would be extremely high".
- b) The fact that the ground water has a TDS level of up to 3000ppm hardly justifies the conclusion that "neither of these (cleanup) alternatives appears warranted".

Page 08-099(5), Paragraph(c):

- a) The statement that "(the third) remedial action alternative is the only realistic one" has not been backed up with documentation.
- b) Conceding the contaminated ground water to a degraded status containing "a realistic level" of petroleum hydrocarbons is too imprecisely defined.

Page 08-099(6), Paragraph 1:

- a) A gasoline-water separator does not represent "best available technology". Carbon adsorption or air stripping can readily achieve 99% removal of dissolved petroleum hydrocarbons.
- b) Additional information should be submitted demonstrating that the injection of treated ground water won't force part of the contamination plume offsite.
- c) Information on the construction details and pumping rate of the injection well should be submitted.
- d) Information should be submitted on the projected petroleum hydrocarbon levels in the reinjected ground water.

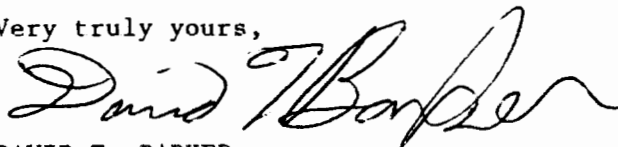
e) Is it not desirable to create a cone of depression rather than to "preserve the (existing) ground water level?"

Although I consider this an unacceptable response to Directive 1 of Cleanup and Abatement Order No. 85-77, I have decided to defer the determination of final cleanup levels for the site until later in the cleanup program. Thus you will not need to resubmit a report at this time but at some point in the future, you will need to fulfill the requirements of Directive 1 of Order No. 85-77. Meanwhile, you must continue to implement whatever remedial actions are most appropriate to clean up the petroleum hydrocarbon contamination resulting from the fuel leak at the Mobil Service Station. As you know, if you use a ground water extraction, treatment, and reinjection system, you will need to obtain waste discharge requirements from this office before you can initiate the discharge. (We have your Report of Waste Discharge but it is incomplete. We will be sending a letter regarding the Report of Waste Discharge under separate cover.) In any case, it is imperative that your ground water cleanup program be so designed as to insure that the petroleum hydrocarbon contamination does not spread or migrate beyond its present boundaries. Your cleanup program will need to include monitoring provisions capable of demonstrating that the affected zone(s) of contamination has in fact been immobilized. Some of the monitoring requirements that the cleanup operation must satisfy will be specified in an addendum to the Cleanup and Abatement Order No. 85-77. The addendum to the Order will be issued to Mobil Oil Corporation in the near future.

At some point later in the cleanup program, at the direction of the Executive Officer, Mobil Oil Corporation shall submit a report to this office to satisfy the requirements of Directive 1 of the soon-to-be-amended Cleanup and Abatement Order. Regional Board staff, after reviewing Mobil Oil Corporation's report, will select the final cleanup levels to be met at the site and then Mobil Oil Corporation shall proceed to implement the appropriate remedial action plan to attain these final cleanup levels. At such time as Mobil Oil Corporation or the Regional Board staff feels that the final cleanup levels have been achieved at the site, Mobil Oil Corporation shall conduct a closure investigation to determine whether or not the applicable final cleanup levels have in fact been attained. If Mobil Oil Corporation can demonstrate, to the Regional Board's satisfaction, that the final cleanup levels have been attained throughout the affected contamination zone, the Regional Board shall consider the cleanup program to be completed.

If you have any questions, please call Mr. Scott Hugenberger at (619) 265-5114.

Very truly yours,



DAVID T. BARKER
Senior Engineer

SGH:vn

State of California
Regional Water Quality Control Board
San Diego Region

EXECUTIVE OFFICER SUMMARY REPORT
September 16, 1985

ITEM: 16

SUBJECT: MOBIL OIL CORPORATION, MOBIL SERVICE STATION 08-099,
POWAY, SAN DIEGO COUNTY: CLEANUP AND ABATEMENT ORDER

DISCUSSION: By a report dated March 23, 1984, Mobil Oil Corporation informed Regional Board staff that Mobil discovered an underground line leak at Mobil Service Station No. 08-099 in Poway. Mobil believes the underground fuel line had been ruptured on November 23, 1983 and that 4700 gallons of petroleum hydrocarbon was discharged to the ground water as a result of the leak. Ongoing recovery operations by Mobil Oil Corporation have succeeded in recovering approximately 2400 gallons of petroleum hydrocarbon product so far. In September, 1985 Cleanup and Abatement Order No. 85-77 was issued to Mobil Oil Corporation to specify final cleanup goals.

Mobil Service Station No. 08-099 is situated in the Poway Hydrographic Subunit of the Penasquitos Hydrographic Unit. The Basin Plan established municipal, industrial service supply, and agricultural uses as the beneficial uses for the ground waters in the Poway Hydrographic Subunit. The surface waters in the Poway Hydrographic Subunit have been assigned agricultural, industrial service supply, contact water recreation, non-contact water recreation, warm freshwater habitat, and wildlife habitat as the beneficial uses. The site is located about 500 feet north of Poway Creek. Since the ground water underlying the Mobil Service Station appears to be flowing in the southerly direction, the contaminated plume threatens to discharge into Poway Creek.

According to Mobil Oil Corporation, there is one operational groundwater well in the area which is used for domestic purposes. This domestic well is located approximately 750 feet downgradient of the site.

The Cleanup and Abatement Order contained in today's agenda establishes cleanup criteria for the site that are consistent with the protection of the beneficial uses of the ground and surface waters in the Poway Hydrographic Subunit.

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

6154 Mission Gorge Road
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Telephone: (619) 265-5114



November 19, 1986

R. J. Edwards, Region Environmental Manager
Mobil Oil Corporation
P.O. Box 2122
Los Angeles, California 90051

RE: REPORT OF WASTE DISCHARGE FOR GROUND WATER BIOREMEDIATION, 13556 POWAY ROAD, POWAY

I have reviewed your Report of Waste Discharge in application for Waste Discharge Requirements for the proposed ground water reinjection operation at the Mobil Service Station No. 08-099 in Poway. The following must be submitted before we can continue processing your application:

1. Thirteen copies of your permit application will be required due to the fact that several other governmental agencies will be reviewing your permit application.
2. A quantitative description of the quality of the waste discharge. You should specify the concentrations in the waste discharge (reinjectate) for the following constituents:
 - (a) All of the constituents for which there are Water Quality Objectives listed in the Basin Plan for this hydrographic Subunit:

(1) Total Dissolved Solids	(7) Manganese
(2) Chloride	(8) MBAS
(3) % Sodium	(9) Boron
(4) Sulfate	(10) Turbidity
(5) Nitrate	(11) Color
(6) Iron	(12) Fluoride
 - (b) Benzene
 - (c) Toluene
 - (d) Xylenes
 - (e) Ethylbenzene
 - (f) Total Phenols
 - (g) Total Lead
 - (h) Total Petroleum Hydrocarbons
3. A site map showing all of the monitoring wells that are not depicted in Figure 1 in the Report of Waste Discharge.
4. Corrected system flow rates. A permit cannot be issued if the maximum or average flow rate exceeds the design flow rate.

November 19, 1986

5. You must establish and submit, as part of the Report of Waste Discharge, a remedial action protocol that you would implement in the event that evidence indicates that ground water may be breaching and migrating out of the "closed loop" system.

The Regional Board calls your attention to the provision of Government Code Section 84308(c). This statute requires all applicants for waste discharge requirements or NPDES permits to include with their application a statement disclosing any contributions made by the applicant to any Regional Board member if the contributions amounted to \$250 or more, were made within 12 months of the date of the application, and were to be used in a federal, state or local election. For your information, the current Regional Board members are: Mary Jane Forster, Gary Arant, Harriet M. Stockwell, Norma J. Scheuneman, Terrance Thielen, Charles Badger, John Foley, Ernie Schneider and James Mocalis.

In order for a waste discharge permit to be considered at a Regional Board meeting, the completed Report of Waste Discharge must be submitted to this office no later than 30 calendar days plus 15 working days prior to the meeting date. The next Board meetings are scheduled for December 8, 1986, January 23 and March 9, 1987.

As discussed in the November 10, 1986 phone conversation between Mr. Scott Hugenberg of this office and Mr. Craig Galloway of your office, the Regional Board has no objection to you starting construction on the proposed ground water bioremediation treatment system. I understand that you may wish to commence reinjection before the Waste Discharge Requirements are issued. After we have received a satisfactory and complete Report of Waste Discharge, I will consider writing an Addendum to Cleanup and Abatement Order No. 85-77 that would allow you to start up the ground water bioremediation process. You will not be able to commence reinjection until you receive the Addendum to the Order from this office.

If you have any questions, please call Mr. Scott Hugenberg at (619) 265-5114.

Very truly yours,



DAVID T. BARKER
Senior Engineer

SGH:es

cc: Ms. Victoria Gallagher
Department of Health Services
County of San Diego
1700 Pacific Highway
San Diego, CA 92101

Dr. Jeffery Wiegand
Alton Geoscience
16510 Aston Street
Irvine, CA 92714

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

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Telephone: (619) 265-5114



October 15, 1987

File copy

Mr. R.J. Edwards
Region Environmental Manager
Mobil Oil Corporation
3800 Alameda Avenue, Suite 700
Burbank, California 91505-4331

Dear Mr. Edwards:

RE: MOBIL SERVICE STATION ON POWAY ROAD

As you know, Mobil Oil Corporation is required by Directive 6 of Cleanup and Abatement Order 85-77 to submit quarterly monitoring reports to this office. I have received and reviewed your report dated October 12, 1987. This report does not contain the information required under Directive 6. This letter is to inform you that the failure of Mobil Oil Corporation to submit this information constitutes a violation of the terms and conditions of your Cleanup and Abatement Order. Furthermore, dischargers who fail to submit monitoring reports may be liable for administrative civil liability prescribed in California Water Code Section 13350(d)(1). The total maximum civil liability which can be administratively imposed by the Regional Board is substantial and can range up to \$5,000.00 per day for each day of violation.

I strongly urge you to submit a report with the information required under Directive 6 to this office no later than October 22, 1987.

If you have any questions on this matter please contact Ms. Lani Lee or Mr. Scott Hugenberg at the above number.

Very truly yours,

Ladin H. Delaney

LADIN H. DELANEY
Executive Officer

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

9771 Clairemont Mesa Blvd., Suite B
San Diego, California 92124-1331
Telephone: (619) 265-5114



October 28, 1987

Mr. Bob Logan
Alton Geoscience
16510 Aston Street
Irvine, California 92174

Dear Mr. Logan:

Enclosed is a copy of Addendum No. 1 to Cleanup and Abatement Order No. 85-77 for Mobil Service Station No. 08-099 in Poway. You will find all the information we spoke of in this addendum.

If you have any more questions on the quarterly monitoring reports, please feel free to call myself or Mr. Scott Hugenberger at the above number.

Very truly yours,

Lani Lee

enc.

cc: Ms. Jane Keith
Mobil Oil Corporation
3800 W. Alameda Ave., Suite 700
Burbank, California 91505-4331